

CALIFORNIA ANTI-SLAPP PROJECT

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

(WESTERN DIVISION)

DR. ALLEN PANZER, et al.,

Plaintiffs,

vs.

YELP INC.,

Defendant.

Case No. 2:13-cv-07805-DDP-JCG

DECLARATION OF MARK GOLDOWITZ
IN SUPPORT OF DEFENDANT'S
SPECIAL MOTION TO STRIKE
COMPLAINT

Date: February 10, 2014

Time: 10:00 a.m.

Courtroom: 3 - 2nd Floor

Judge: Hon. Dean D. Pregerson

Action Filed: October 22, 2013

Complaint Served: October 25, 2013

DECLARATION OF MARK GOLDOWITZ

I, Mark Goldowitz, hereby declare:

1. I am an attorney at law, duly admitted to practice before the United States District Court for the Central District of California, and I am the Director of the California Anti-SLAPP Project, counsel for defendant Yelp Inc. ("Yelp"). I have personal knowledge of the facts stated in this declaration, unless otherwise indicated, and could competently testify thereto. I have knowledge of the files and documents in this matter.

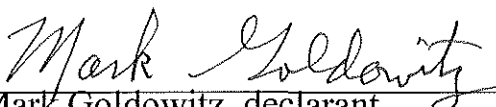
2. Plaintiffs filed this Complaint on October 22, 2013. Dkt No. 1. I am informed and believe that Yelp did not receive any demand for compensation from any plaintiff or his or her counsel before the Complaint was filed.

3. On December 17, 2013, I called and emailed counsel for plaintiffs, Randy Rosenblatt, to initiate a pre-motion conference pursuant to Local Rule 7-3, prior to filing this special motion to strike. By email, Mr. Rosenblatt asked me to summarize in an email the highlights of the planned motion. I did so, including providing citations for key cases.

4. On December 23, Mr. Rosenblatt and I had a telephone conversation in which we discussed the anticipated motion. We disagreed about the merits of the motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 31st day of December, 2013, in Berkeley, California.


Mark Goldowitz, declarant,
and counsel for Defendant Yelp